# CONFIDENTIAL

To: Tony Verga

Fr: Bob Snyger, RAMS Principal

Re: Internet Materials
Dt: December 18, 1998

This memo is to document a conversation we had regarding your use of Internet services on school equipment during school hours. As I mentioned to you in our discussion, some different students reported to Mrs. DeMarco and to me that they saw inappropriate pictures on your computer screen during class time in your room. Specifically, these students reported that they saw pictures of nude people on your screen. When I brought this concern to your attention, you did not deny the incident occurred. You explained to me that while "surfing the net" you came upon some seemingly innocent sites, but when you brought this material to the screen, they actually did contain nude images. You explained that you thought our Cyber Patrol would prohibit any such images, and you were surprised when such material did appear on your screen. Matter of fact, during our discussion in your room, you demonstrated this occurrence by bringing up an innocently named site, which actually produced a nude photograph on your screen.

I do not believe your actions were ever malicious or corrupt. I have no reason to doubt your word about the innocence of your-browsing. As building administrator, however, I feel I must provide you with some guidelines so these concerns do not surface again. First, I do not think it is prudent for a teacher to be browsing unknown sites that could produce questionable material while students are in class. If you do not know what may come up on your screen, then do not search for such material during student time in the room. This eliminates any possibility that students could see objectionable material in your room. Second, I must ask that if, at any time, any type of pornographic or objectionable material is produced on your computer you would notify me immediately. This puts me on notice that the potential for controversy exists, and we can "head it off at the pass." This also demonstrates your willingness to clarify a technology problem, as opposed to hiding it by not bringing it to an administrator's attention. It also allows us to better define the parameters for our Cyber Patrol by reviewing sites that get through the security program.

Again, I have no reason to question your explanation of these incidents, and as such, I consider the matter closed and resolved. If, for some reason, pornographic type material would continue to be displayed on your computer, then disciplinary action would need to be taken. I sincerely do not believe this will ever need to be the case.

If you have any questions, please contact me.

pc: Wally Blucas, Superintendent of Schools Rick Killian, GFT Building Rep



# To all Girard Parents of Middle School Students

Class) on the Inter net, on several different occasions? HAVE SEEN a <u>teacher</u> viewing <u>PORNOGRAPHY,</u> (During Are you aware that Students at the Middle Schoo

A complaint HAS been made by some students and parents to the principle and superintendent. This teacher continues to sit in a classroom with our children.

Superintendent and voice your opinion. If you're a Concerned Parent, Please contact you principal and



Policy Committee - June 19, 2000

Attendees: Bob Heath, Roger Sanders, Scott Beam, Doug Wright, Marilyn Vargulich, Bill Bonnett, Wally Blucas, Gary Faulkner

The Committee discussed the sexual harassment policy. There is concern among the Committee because steps/procedures are being eliminated from the revised policy and the lack of specificity. Mr. Blucas said due to the last incident, the steps in the current policy handicapped the legal position of the District. Attorneys Perhacs and Wassell have been working on various policies for other districts and their experience with court cases leaves them with the opinion that not having the steps in the policy is more of an advantage than having the steps in the policy.

Mr. Heath expressed his concern that there are some many gray areas in the policy. Mr. Wright explained that sexual harassment is such a new area in terms of the law and changing every day that the recommendation is to not bind yourself with steps and specific definitional situations.

Mr. Blucas will check with PSBA regarding an update of sexual harassment policies. Mr. Blucas also said he could check with Dan Miller, Chris McClure, Mark Wassell/Rich Perhacs and possibly someone from PSBA to come and do an overview of sexual harassment for the Committee.

Next meeting - August 21st at 6:30 p.m.

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### Policy Committee - August 22, 2000

Attendees: Roger Sanders, Marilyn Vargulich, Scott Beam, Bob Heath, Doug Wright, Kelly Weidler, Wally Blucas

The Committee reviewed the following topics:

WEB Page Standards – The Committee reviewed the "web page standards" that were previously distributed.

Mr. Heath said he reviewed the policy from Chambersburg School District and noted that their Internet policy includes the WEB page policy within it. Mr. Heath feels that this is good in that everything is in the policy manual in the same area.

A discussion took place about appointing a Web page administrator. The Committee prefers the language of "principal or his/her designee". It was suggested having Solicitor Miller review the Chambersburg policy as a guide with the Web Page Standards that has already been developed and combine the two. Mr. Blucas noted that two people in the high school and middle school will be handling the web master duties as part of their teaching schedule this year.

Mr. Wright suggested getting the policy "ready", but feels the time is not good to implement at the present time.

Scott Beam presented some questions from Karen Golubic and Rich Radock regarding the Web Page Standards Policy. The Committee reviewed this list and discussed it further. It was the consensus of the Committee to send the information to Solicitor Miller to be considered with the drafting of the new policy.

Sexual Harassment - After reviewing sample copies from other school district, Mr. Heath feels the district should be addressing ethnic harassment as well as harassment in general. Mr. Blucas is still checking with the attorneys to see if they could do a workshop on this issue for the Board.

(Mr. Heath also noted that in our PSBA policy manual, there are a few policies listed in the Table of Contents that are not in the actual policy manual - example #219 - Student Hearing and #426 - Complaint Policy. Mr. Blucas thought it was probably due to a generic Table of Contents issued from PSBA.)

Charter School Policy – Mr. Blucas said the I.U. superintendents are meeting as a consortium through the Intermediate Unit with the Montessori personnel to discuss their charter school application on September 13th. Mr. Blucas talked with Chris McClure and decided to put the Charter School Policy on hold for the time being. Mr. Blucas also said that hopefully one of the outcomes is that all the schools will basically have the same "Charter School" policy.

822 Policy



## AFFIDAVIT OF E

- 1. My name is Edited Gall reside at the state of the stat
- 2. In the 1998-1999 school year I was in sixth grade at Rice Avenue Middle School in Girard.
- 3. Sometime during that school year I heard a rumor that my English teacher, Mr. Verga, was looking at pornography on his computer in his classroom. Many times when students entered his room, he would put an assignment on the board that we were to work on in class, and he would be on the computer while we worked. His desk was next to the pencil sharpener, and if we needed to sharpen our pencils, it was impossible not to see what he was looking at.
- 4. One day another student and I saw him looking at pictures of naked women. We went to the guidance counselor's office and left a note in her box that she called the "safe zone," where students could leave a message about something confidential. We told her in the note that we saw naked women on Mr. Verga's computer.
- 5. The guidance counselor, Mrs. De Marco, called us to her office. She said she had talked to Mr. Snyder about it. She said it was probably just artwork and we shouldn't make a big deal out of it.
- 6. Then Mr. Snyder called us to his office several days later for a meeting with him and Mrs. De Marco. They said they had looked into it, and it was either artwork or Mr. Verga was testing the new computer security system. They said we needed not to make a big deal out of it. They made me feel stupid for saying anything.



- 8. I didn't tell anybody else about it until my friend, Hand State told her mother that I had been told not to tell, and her mother told my mother.
- 9. During that same school year, I had Mr. Yarbenet for science. He didn't spend much time teaching. We watched a lot of movies and spent a lot of time talking.
- 10. The girl S who brought this lawsuit, was a year older, in seventh grade. Every single day, or at least it seemed like every day, S would come to science class. She would get a pass every day. Sometimes she would sit in his chair, and sometimes they would talk about plans for her to go to his house after school, and sometimes they would go together to the storeroom next to his classroom.
- 11. Students were jealous of all the attention Mr. Yarbenet gave S People would gossip and laugh about their relationship while they were in the storeroom. My impression is that the whole school knew about them. If you said "Yarb's girlfriend," everybody knew who you meant.
- 12. I saw them together a lot, not just in my science class, but also they would be in his room alone during class breaks, and I would see him giving her rides after school in his car. They were always very close, so close they touched, and he would be flirting with her.



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Date: 7/21/2005

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E G

Witness:

Carolyn Spicer Russ, Esquire

Pa. ID 36232

1007 Mount Royal Blvd. Pittsburgh PA 15223

# FORM OF ACKNOWLEDGMENT BY AN ATTORNEY AT LAW

Commonwealth of Pennsylvania

County of Meafring

on this, the 21<sup>st</sup> day of July , 2005, before me TOANN MATOKA, the undersigned officer, personally appeared Carolun Spicer Russ, known to me (or satisfactorily proven) to be a member of the bar of the highest court of said state, supreme Court ID Number 36232, and a subscribing witness to the within instrument, and certified that she was personally present when Example 1997, whose name is subscribed to the within instrument executed the same; and that said person acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Notary Public

COMMONWEALTH OF PENNSYLVANIA Notarial Seal Joann Matoka, Notary Public Shaler Twp., Allegheny County My Commission Expires Feb. 2, 2008

Member, Pennsylvania Association Of Notaries



# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STEENS. et al.,	) Civil Action No. 04-150E
Plaintiffs,	) HON. SEAN J. McLAUGHLIN
v.	)
GIRARD SCHOOL DISTRICT, et al.,	) ) )
Defendants.	)

### AFFIDAVIT OF WENDY G

Wendy Generally, being duly sworn, deposes and states as follows:

- 1. I live at
- 2. In the 1998-1999 school year, my daughter, E was in sixth grade at Rice Avenue Middle School.
- 3. A neighbor called to tell me that a month or so previously my daughter had seen a teacher, Mr. Anthony Verga, looking at pictures of naked women on his computer at school, and she had been told not to tell anybody.
- 4. I questioned Element about this, and she told me that she had seen Mr. Verga looking at naked women on his computer and that she had told the guidance counselor, Mrs. De Marco, and Mrs. De Marco told her to keep this between the two of them and that Element should not tell anyone else.
- 5. Upon hearing E story, I met with the principal, Bob Snyder, and Mrs. De Marco and told them what E had told me.



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- 6. Mr. Snyder told me in that meeting that he had talked to Mr. Verga about what he was watching on his computer. Mr. Snyder said that what Enter had seen was either an accidental, one-time thing or it was art. Mrs. De Marco admitted at that meeting that she had told my daughter she should not spread this around but denied telling her that she should not tell anyone. I asked Mr. Snyder whether the school could check Verga's computer and he said no. I felt that Mr. Snyder and Mrs. De Marco were trying to give the impression that they had taken care of what was an accident.
- 7. I was not satisfied with their explanation, so I called the superintendent, Wally Blucas. He was not polite in our conversation and in fact was rude to me. The conversation was so short that I can't even remember what was said, other than that he said Verga's action was a "one-time thing."
- 8. Consequently, after having talked to both Mr. Snyder and Mr. Blucas about this, I went to a school board meeting in early 1999 and signed up to speak. I asked why the school was letting my daughter be exposed to pornography on a teacher's computer.
- 9. My daughter gave me a list of other students who had seen Verga looking at pornography. I invited the parents of these students to my house. Everyone at my house that night had different accounts of what their children had told them about Verga's computer use. Some children said they had seen him looking at pornographic pictures of women, some had seen pictures of women with women, and some had seen men with men.



WY

- 10. Several parents, including me, went to the next school board meeting to express our concern about Mr. Verga watching pornography on his computer in his sixth grade classroom. At that board meeting, one of the board members called us Biblethumping witch hunters. He accused us of using Nazi tactics.
  - 11. Eventually I learned that Anthony Verga was allowed to resign.
- 12. A man whose name and title I don't remember called to tell me that Mr. Verga was losing his teaching license. He said that when Mr. Verga's computer was checked by the school district, they found that he had accessed pornographic sites more than 300 times.
- 13. My daughters Estate and Action (twins) both had Gregory Yarbenet for science that same year, 1999-2000.
- 14. When Yarbenet was arrested my children told me that they were not surprised or shocked. They said it was common knowledge among the students at the school that S and Yarbenet were acting like boyfriend and girlfriend. My daughters told me that the kids would often joke, "Here comes Yarbenet and his girlfriend."
- 15. My children also told me that when they were in Mr. Yarbenet's science class S would come in and she and Yarbenet would go into the storeroom next to his classroom. The girls told me that the kids would giggle and joke about what was going on in the storeroom. I asked my children whether they ever reported it, and they said why would you report something that everybody knew.



Date: 7-21-05

1340

Wendy G

Witness:

Carolyn Spicer Russ, Esquire

Pa. ID 36232

1007 Mount Royal Blvd. Pittsburgh PA 15223

# FORM OF ACKNOWLEDGMENT BY AN ATTORNEY AT LAW

Commonwealth of Pennsylvania

On this, the 21st day of July , 2005, before me John Matora, the undersigned officer, personally appeared (avoluting Spicer Russ), known to me (or satisfactorily proven) to be a member of the bar of the highest court of said state, supreme Court ID Number 36232, and a subscribing witness to the within instrument, and certified that she was personally present when Wendy God, whose name is subscribed to the within instrument executed the same; and that said person acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Joann Matoka, Notary Public Shaler Twp., Allegheny County My Commission Expires Feb. 2, 2008

Member, Pennsylvania Association Of Notaries

# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

S' S.; and JOHN and MARY ELLEN S., on behalf of their daughter, Land A. S., a minor	) Civil Action No. 04-150E )
Plaintiffs,	) Jury Trial Demanded
v.	)
GIRARD SCHOOL DISTRICT; ROBERT SNYDER, Individually and in his capacity as Principal of the Rice Avenue Middle School; and GREGORY YARBENET, a professional employee of the Girard School District,	) ) ) ) ) ) ) ) ) ) ) )
Defendants.	)

# SECOND NOTICE OF RULE 30(b)(6) DEPOSITION

TO: Girard School District
c/o Richard A. Lanzillo, Esquire
KNOX McLAUGHLIN GORNALL & SENNETT, P.C.
120 West Tenth Street
Erie, PA 16501

PLEASE TAKE NOTICE that Plaintiff will take the deposition of the Girard School District on the June 30, 2005, at 9:30 a.m., pursuant to Rule 30(b)(6) Fed.R. Civ.Pro., at the offices of Richard A. Lanzillo, 120 West Tenth Street, Erie, Pennsylvania 16501. The Girard School District shall designate one or more officers, directors, managing agents, or other persons who consent to testify on the following particulars:

- 1. the circumstances by which the School District handled the investigation leading to termination of teacher Anthony Verga, the contents of any agendas or minutes of school board meetings where parents spoke about Verga, and any steps taken by Robert Snyder or other school administrators in response to complaints from students;
- 2. the dates when Verga's conduct was first brought to the School District's attention;
- 3. the dates on which the School District took any action upon the complaints involving Verga;
- 4. the School District's sexual harassment policy in effect in 2000-2001, including the procedures contemplated by the policy for reporting acting on, or preventing sexual harassment, and including identity of the sexual harassment officer for the Rice Avenue Middle School building.

Respectfully submitted,

Edward A. Olds, Esquire

Pa. I.D. No. 23601

Carolyn Spicer Russ, Esquire

Pa. I.D. No. 36232

Richard Matesic, Esquire

Pa. I.D. No. 72211

Attorneys for Plaintiffs



### CERTIFICATE OF SERVICE

I, Edward A. Olds, hereby certify that a true and correct copy of the foregoing was served upon the following by United States First Class Mail, Postage Prepaid.

Richard A. Lanzillo, Esquire KNOX McLAUGHLIN GORNALL & SENNETT, P.C. 120 West Tenth Street Erie, PA 16501

Edward J. Betza, Esquire ELDERKIN MARTIN KELLY & MESSINA 150 East Eighth Street Erie, PA 16501

Date: 6(24(04

Edward A. Olds, Esquire

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# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STACY S.; and JOHN and MARY Civil Action No. 04-150E ELLEN S., on behalf of their daughter, LEIGH ANN S., a minor Plaintiffs, Jury Trial Demanded v. GIRARD SCHOOL DISTRICT; ROBERT SNYDER, Individually and in his capacity as Principal of the Rice Avenue Middle School; and GREGORY YARBENET, a professional employee of the Girard School District, Defendants.

### NOTICE OF RULE 30(b)(6) DEPOSITION

TO: Girard School District
c/o Richard A. Lanzillo, Esquire
KNOX McLAUGHLIN GORNALL & SENNETT, P.C.
120 West Tenth Street
Erie, PA 16501

please Take Notice that Plaintiff will take the deposition of the Girard School District on the September 30, 2005, at 10:00 a.m., pursuant to Rule 30(b)(6) Fed.R.Civ.Pro., at the offices of Richard A. Lanzillo, 120 West Tenth Street, Erie, Pennsylvania 16501. The Girard School District shall designate one or more officers, directors, managing agents, or other persons who consent to testify on the following particulars:



The Ninth Affirmative Defense which raises the question of the School District being misled. The deposition will cover the factual basis for this Affirmative Defense, and requests Defendant to produce persons who will testify as to the dates that the Defendants were misled, the contents of misleading statements, and the identity of the persons who provided the misleading statements.

Respectfully submitted,

Edward A. Olds, Esquire

Pa. I.D. No. 23601

Carolyn Spicer Russ, Esquire

Pa. I.D. No. 36232

Richard Matesic, Esquire

Pa. I.D. No. 72211

Attorneys for Plaintiffs

### CERTIFICATE OF SERVICE

I, Edward A. Olds, hereby certify that a true and correct copy of the foregoing was served upon the following by United States First Class Mail, Postage Prepaid.

Richard A. Lanzillo, Esquire KNOX McLAUGHLIN GORNALL & SENNETT, P.C. 120 West Tenth Street Erie, PA 16501

> Edward J. Betza, Esquire ELDERKIN MARTIN KELLY & MESSINA 150 East Eighth Street Erie, PA 16501

Date: 9/22/05

Edward A. Olds, Esquire

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//www.casinospain.com/mistress45re.html

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                       3: Session Terminating. Active for 0:0:18.917
 98/11/02 07:11:39
                       4: Accepting connection from [192.168.0.102:1038] Not Verified
 98/11/02 07:11:39
                       4: Mail From (MAIL FROM): <thuntley@gsd.k12.pa.us>
 98/11/02 07:11:39
                       4: Mail Recipient: <zawasr@ix.netcom.com>
 98/11/02 07:11:39
                       4: Message Received. 2259 Bytes.
 98/11/02 07:11:39
                       4: Session Terminating. Active for 0:0:0.70
198/11/02 07:12:34 5: Accepting connection from [192.168.0.104:1048] Not Verified 198/11/02 07:12:34 5: Mail From (MAIL FROM): <tverga@gsd.kl2.pa.us>
 98/11/02 07:12:34
                      5: Mail Recipient: <fred@parkersgallery.com>
 98/11/02 07:12:35
                      5: Message Received. 408 Bytes.
 98/11/02 07:12:35
                      5: Session Terminating: Active for 0:0:0.280
 98/11/02 07:24:01
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98/11/02 07:24:01
                      6: Mail From (MAIL FROM): <gyarbenet@gsd.k12.pa.us>
98/11/02 07:24:01
                      6: Mail Recipient: <brudders@hic.net>
98/11/02 07:24:01
                      6: Message Received. 1354 Bytes.
98/11/02 07:24:02
                      6: Session Terminating. Active for 0:0:0.771
98/11/02 07:24:29
                      7: Accepting connection from [192.168.0.141:1035] Not Verified
98/11/02 07:24:29
                      7: Mail From (MAIL FROM): <jjones@gsd.k12.pa.us>
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                      7: Mail Recipient: <klorei@gsd.k12.pa.us>
98/11/02 07:24:29
                      7: Message Received. 1153 Bytes.
98/11/02 07:24:29
                      7: Session Terminating. Active for 0:0:0.231
98/11/02 07:24:30
                      8: Accepting connection from [192.168.0.55:1030] Not Verified
98/11/02 07:24:30
                      8: Mail From (MAIL FROM): <knichols@gsd.k12.pa.us>
                      8: Mail Recipient: <rck-rak@webtv.net>
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98/11/02 07:24:30
                      8: Message Received. 1901 Bytes.
98/11/02 07:24:30
                      8: Session Terminating. Active for 0:0:0.60
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                      9: Accepting connection from [198.120.14.11:1035] Not Verified
                      9: Mail From (MAIL From): <TNUZBACK@email.usps.gov> SIZE=2187
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98/11/02 07:26:51
                      9: Mail Recipient: <akellogg@mail.gsd.k12.pa.us>
98/11/02 07:26:51
                      9: Message Received. 2492 Bytes.
98/11/02 07:26:52
                      9: Session Terminating. Active for 0:0:1.492
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98/11/02 07:29:42
98/11/02 07:29:42
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98/11/02 07:29:42
                     a: Mail Recipient: <Tim@aol.com>
98/11/02 07:29:42
                     a: Message Received. 636 Bytes.
98/11/02 07:29:43
                     a: Session Terminating. Active for 0:0:0.761
98/11/02 07:36:39
                     b: Accepting connection from [192.168.0.83:1032] Not Verified
98/11/02 07:36:39
                     b: Mail From (MAIL FROM): <rkillian@gsd.k12.pa.us>
98/11/02 07:36:39
                     b: Mail Recipient: <kgolubic@gsd.k12.pa.us>
98/11/02 07:36:42
                     b: Message Received. 1332279 Bytes.
98/11/02 07:36:43
                     b: Session Terminating. Active for 0:0:3.746
98/11/02 07:39:42
                     c: Accepting connection from [192.168.0.55:1069] Not Verified
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